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9 IN THE UNITED STATES DISTRICT COURT
10 EASTERN DISTRICT OF CALIFORNIA

11 UNITED STATES OF AMERICA,
12 Plaintiff,
13 v.
14 REGINALD THOMAS,
15 Defendant.
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CASE NO. 2:20-CR-012-MCE

STIPULATION REGARDING EXCLUDABLE
TIME PERIODS UNDER SPEEDY TRIAL ACT;
ORDER

DATE: January 14, 2021

TIME: 10:00 a.m.

COURT: Hon. Morrison C. England, Jr.

17 **STIPULATION**

18 Plaintiff United States of America, by and through its counsel of record, and defendant, by and
19 through defendant's counsel of record, hereby stipulate as follows:

- 20 1. By previous order, this matter was set for status on January 14, 2021.
- 21 2. By this stipulation, defendant now moves to continue the status conference until March
22 18, 2021, and to exclude time between January 14, 2021, and March 18, 2021, under Local Code T4.
- 23 3. The parties agree and stipulate, and request that the Court find the following:
- 24 a) The government has represented that the discovery associated with this case
25 includes numerous reports and related documents, photographs, audio recordings, and videos.
26 All of this discovery has been either produced directly to counsel and/or made available for
27 inspection and copying.
- 28 b) Upon defendant's request, new counsel for the defendant was appointed on

1 December 17, 2021. Counsel for defendant desires additional time to continue to conduct
2 investigation and research related to the charges, review discovery for this matter, to discuss
3 potential resolutions with her client, and to otherwise prepare for trial.

4 c) Counsel for defendant believes that failure to grant the above-requested
5 continuance would deny her the reasonable time necessary for effective preparation, taking into
6 account the exercise of due diligence.

7 d) The government does not object to the continuance.

8 e) Based on the above-stated findings, the ends of justice served by continuing the
9 case as requested outweigh the interest of the public and the defendant in a trial within the
10 original date prescribed by the Speedy Trial Act.

11 f) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161,
12 et seq., within which trial must commence, the time period of January 14, 2021 to March 18,
13 2021, inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code
14 T4] because it results from a continuance granted by the Court at defendant's request on the basis
15 of the Court's finding that the ends of justice served by taking such action outweigh the best
16 interest of the public and the defendant in a speedy trial.

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4. Nothing in this stipulation and order shall preclude a finding that other provisions of the Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial must commence.

IT IS SO STIPULATED.

Dated: January 11, 2021

McGREGOR W. SCOTT
United States Attorney

/s/ TANYA B. SYED
TANYA B. SYED
Assistant United States Attorney


Dated: January 11, 2021

/s/ SHARI RUSK
SHARI RUSK
Counsel for Defendant
REGINALD THOMAS

ORDER

IT IS SO ORDERED.

Dated: January 12, 2021


MORRISON C. ENGLAND, JR.
SENIOR UNITED STATES DISTRICT JUDGE